Air Transport Association

February 16, 2001

Docket Management System
Department of Transportation,
Room PL 401,
400 Seventh Street, NW,
Washington, DC 20590-0001
Attention: Docket No. FAA-1999-6063

Subject: Harmonization of Braking System, Airworthiness Standards for Transport Category Airplanes – Supplemental Notice of Proposed Rulemaking

Ladies/Gentlemen:

FAA has issued as supplemental proposal to amend 14 CFR Part 25, which addresses FAA/JAA harmonization of the airworthiness standards for the braking systems of transport category airplanes. The changes proposed in this supplemental notice would require an additional dynamometer test during brake qualification. ATA appreciates the opportunity to comment on this proposal.

Our members do not object to the proposed airworthiness standards. However, it is noted in one of the attached comments that the standards do not consider additional braking equipment, which is installed on certain model airplanes. Appropriate recognition should be given to account for the functionality of systems that are required for certification.

Your serious consideration of these comments would be greatly appreciated.

Sincerely,

Charlie Bautz
Director, Operational Engineering

Attachment

Air Transport Association of America, Inc.
1301 Pennsylvania Ave., NW – Suite 1100 Washington, DC 20004-1707
(202) 626-4000

UNITED AIRLINES

Maintenance Operations

January 31, 2000

Air Transport Association of America
1301 Pennsylvania Ave..NW, Suite 1100
Washington, D.C. 20004-1707

Attention: Mr. Charlie Bautz
Director, Operational Engineering

Subject: Revision of Braking Systems; Airworthiness Standards to Harmonize with European Airworthiness Standards for Transport Category Airplanes
NPRM Docket No. FAA-l999-6063, Notice No. 99-16A

Reference: ATA Memo 00-AE-101

Dear Mr. Bautz,

We have reviewed the above named NPRM. The NPRM addresses the harmonization of FAR and JAR certification standards for airplane braking systems. The proposed change would be made in FAR Part 25 - Airworthiness Standards: Transport Category Airplanes, thus the burden of implementing this change would fall on airplane brake system manufacturers. This change only affects the way that brake systems are certificated, not how they are used. We therefore have concluded that adoption of this change would have no practical effect on United Airlines.

The reference ATA Memo advised of and requested comments on the subject proposed rule that will require no action by United. United concurs with the contents of the proposed rule and has no additional comments.

Sincerely,

J. M. Gay
Chief Engineer

cc: Brian Chapman. United Airlines - SFOEG

US AIRWAYS

January 23, 2001 405-GAD-01-00l

Mr. Charles Bautz
Director, Operational Engineering
Air Transport Association
1301 Pennsylvania Ave., NW Suite 1100
Washington, D.C. 20004-1707

SUBJECT: Comments to Harmonization of Braking System Airworthiness Standards for Transport Category Airplanes Supplemental Notice of Proposed Rulemaking, Docket No. FAA-1999-6063; Notice 99-16A

Reference: ATA AE Memorandum 00-AE-101, dated December 18, 2000

Dear Mr. Bautz:

The referenced ATA memorandum requested operator comments to the subject Supplemental Notice of Proposed Rule Making (SNPRM) concerning the harmonization of braking system airworthiness standards. US Airways supports the intent of the SNPRM for additional dynamometer testing during brake qualification, and offers the following comment.

Airplane braking systems differ between airplane models. Consideration must be given to the additional braking equipment, which is installed on certain model airplanes. When that additional equipment fails or has been rendered inoperative, a more critical condition can exist with the three proposed testing conditions for kinetic energy capacity:

(1) Design landing stop
(2) Maximum kinetic energy
(3) Most severe landing stop

This SNPRM does not account for model specific test qualifications for airplanes equipped with additional braking equipment such as brake fan systems. For example, the brake fan system on an airplane may be rendered inoperative due to system failure or by deactivation in accordance with the airplane minimum equipment list (AMEL). The lack of additional brake cooling, coupled with the additional mass (heat sink) of the brake fan, will further deteriorate conditions at the brake installation. Consequently, braking performance is reduced.

RE Comments to Harmonization of Braking System Airworthiness Standards
for Transport Category Airplanes - Supplemental Notice of Proposed Rulemaking, Docket No. FAA-1999-6063; Notice 99-16A

Recognition of such abnormal conditions must be part of the qualification testing for kinetic energy capacity in all three proposed conditions.

Sincerely,

Gordon G. Kemp
Senior Director, Technical Services

GGK/GAD
Ata/ad/brake 00-AE-101